

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

333 South Grand Avenue  
Los Angeles, CA 90071-3197  
Tel 213.229.7000  
www.gibsondunn.com

Theodore J. Boutrous Jr.  
Direct: +1 213.229.7804  
Fax: +1 213.229.6804  
TBoutrous@gibsondunn.com

November 8, 2023

VIA ECF

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *Consortium for Independent News, Inc. v. NewsGuard Technologies, Inc.*,  
Case No. 23-cv-07088-KPF

Dear Judge Failla:

I represent Defendant NewsGuard Technologies, Inc. (“NewsGuard”) in the above-captioned matter. I submit this letter to respectfully request an adjournment of the Initial Pretrial Conference, currently scheduled for November 16, 2023 at 11:30 AM, and a corresponding extension of the parties’ deadline to file the proposed civil case management plan and joint letter, as provided in the Notice of Initial Pretrial Conference, *see* Dkt. 4.

On October 23, 2023, Plaintiff Consortium for Independent News, Inc. filed an Amended Complaint. On October 31, Plaintiff asked NewsGuard to agree to waive service, which NewsGuard did on November 1. Accordingly, NewsGuard’s deadline to answer the complaint is January 1, 2024. Defendant United States of America has not yet been served. Accordingly, we respectfully request that the Initial Pretrial Conference be adjourned to a date and time at the Court’s convenience, after Defendants’ deadline to respond to the complaint.

Plaintiff’s counsel consents to this request for an adjournment of the Initial Pretrial Conference.

No previous requests for adjournment of the Initial Pretrial Conference have been made.

Respectfully submitted,

/s/ Theodore J. Boutrous Jr.

cc: All counsel of record (via ECF)